

**From:** [Ferris, Brittany \(EOIR\)](#)  
**To:** [All of Court Administrators \(EOIR\)](#); [All of Judges \(EOIR\)](#); [All of OCIJ HDQ \(EOIR\)](#); [All of OCIJ JLC \(EOIR\)](#); [BIA ATTORNEYS \(EOIR\)](#); [BIA BOARD MEMBERS \(EOIR\)](#); [EOIR Library \(EOIR\)](#); [BIA SUPPORT \(EOIR\)](#); [BIA TEAM P \(EOIR\)](#); [Butler, Vicki A. \(EOIR\)](#); [Carr, Donna \(EOIR\)](#); [King, Jean \(EOIR\)](#); [OGC \(EOIR\)](#); [McHenry, James \(EOIR\)](#); [Reilly, Katherine \(EOIR\)](#); [Santoro, Christopher A \(EOIR\)](#)  
**Cc:** [Rose, Karen \(EOIR\)](#); [Atkinson, Pamela \(EOIR\)](#)  
**Subject:** Matter of JASSO ARANGURE, 27 I&N Dec. 178 (BIA 2017)  
**Date:** Friday, December 29, 2017 10:22:48 AM

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The above precedent decision can be found in Volume 27 at page 178. The link to the decision is:

Intranet:

<https://eoirnet/sites/eoir/BIA/VLL/PrecedentDecisions/3910.pdf>

- (1) The Department of Homeland Security is not precluded by res judicata from initiating a separate proceeding to remove an alien as one convicted of an aggravated felony burglary offense under section 101(a)(43)(G) of the Immigration and Nationality Act, 8 U.S.C. § 1101(a)(43)(G) (2012), based on the same conviction that supported a crime of violence aggravated felony charge under section 101(a)(43)(F) in the prior proceeding. *Bravo-Pedroza v. Gonzales*, 475 F.3d 1358 (9th Cir. 2007), not followed.
- (2) Home invasion in the first degree in violation of Michigan Compiled Laws section 750.110a(2) is a categorical burglary offense under section 101(a)(43)(G) of the Act.

*Brittany R. Ferris*

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